

Message

From: Ho, Yenhung [Ho.Yenhung@epa.gov]
Sent: 10/14/2020 2:41:53 PM
To: Albright, David [Albright.David@epa.gov]
Subject: FW: [EXT] RE: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

FYI

From: Shari Ring <Shari.Ring@cadmusgroup.com>
Sent: Tuesday, October 13, 2020 9:50 AM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>
Cc: Rao, Kate <Rao.kate@epa.gov>
Subject: RE: [EXT] RE: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

We can do that – a few notes below about what I'll say.

From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Tuesday, October 13, 2020 12:33 PM
To: Shari Ring <Shari.Ring@cadmusgroup.com>
Cc: Rao, Kate <Rao.kate@epa.gov>
Subject: RE: [EXT] RE: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

Hi Shari,

Please be prepared to answer all of the questions. See couple notes below about the questions. Thank you.

From: Shari Ring <Shari.Ring@cadmusgroup.com>
Sent: Tuesday, October 13, 2020 5:41 AM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>
Cc: Rao, Kate <Rao.kate@epa.gov>
Subject: RE: [EXT] RE: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

Hi Calvin,

Should we be prepared to answer all of these questions on the call tomorrow? Are there any you need to discuss?

I have "released" Mary Ellen from the call, as she will be needed more when we talk about the AoR evaluation.

From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Monday, October 12, 2020 5:02 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; Albright, David <Albright.David@epa.gov>
Cc: Keith Pronske <klpronske@cleanenergysystems.com>; Natalie Nowiski <NNowiski@slb.com>; Shari Ring <Shari.Ring@cadmusgroup.com>; Mary Ellen Tuccillo <maryellen.tuccillo@cadmusgroup.com>; Vivian Rohrback

<VRohrback@slb.com>; Scott Eberhardt <eberhardt4@slb.com>

Subject: [EXT] RE: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

Thank you, Calvin and team, for agreeing to meet with us this week.

We would like the call to cover EPA's Technical Evaluation Comments and Information Request #2, that discussed the Emergency and Remedial Response (ERR) Plan and Financial Responsibility Demonstration documentation, with a focus on the latter.

We are in receipt of EPA's Technical Evaluation Comments and Information Request #3, however should we need further information or clarification on that material, we propose to set up a separate meeting.

Questions/topics for the meeting this week include:

Re: Enclosure 1 for the ERR

- Given the feedback and requests under "Emergency Identification and Response Actions," CES (working with Schlumberger) plans to complete the requested assessments and update the ERR accordingly. So, we plan to submit a revised ERR with our response letter by 31-Oct-2020. This differs than our response to EPA's Technical Feedback #1 regarding Site Characterization where we responded to each item directly. That will make things easier
- For "Staff Training and Exercise Procedures," EPA requests a copy of CES's site specific standard operating procedures and training program. Could EPA please clarify if this is specific for the CO2 injection well only? Note, the envisioned carbon negative energy plant will be a highly integrated facility, including biomass gasification, syngas processing, power generation, and CO2 capture and storage. As such, a significant portion of procedures/programs are unrelated (directly) to CO2 capture/storage/monitoring/USDW/etc. We should be able to tell CES the intent of this request. This request is mostly to provide some context to the (limited) health and safety information available in the E&RR plan without asking them to reinvent the wheel

Re: Enclosure 2 for FR

- CES did use the EPA's Cost Estimation Tool for Class VI Financial Responsibility Demonstrations (the Cost Tool) to develop our estimates submitted with our permit application.
 - o CES understands that EPA developed the Cost Tool to provide an "acceptable range of costs" (including a high-end, middle range, and low-end cost estimate) for Class VI FR activities based on information submitted with a permit application.
 - o Can EPA provide more detail or background on how the low, medium, high cost scenarios are calculated, the basis for the calculations, and any indications on the level of accuracy? Some background about how the Cost Tool generates the ranges of costs and what formulas/approach is used for the calculations of the high, middle, and low estimated will be helpful. We can provide an overview, but we probably should NOT share the formulas, given HQ sensitivity about this spreadsheet. I think it's important to emphasize that we want the third-party site-specific estimate that they plan to provide. And that there is an expectation that this estimate would fall in the range generated by the cost tool.
- Much like other areas of our application, CES will continue to update information as more data and site-specific details are acquired. CES used the Cost Tool for its initial estimates to develop cost ranges but will be providing updated site-specific estimates for the FR categories. Presently, of most concern to CES is the large range estimated for ERR costs. The third-party site-specific estimate should be a single value, and should address this concern.
 - o Also, CES does not anticipate having updated cost estimates for the complete ERR by the requested 31-Oct-2020 response date. Is this ok with EPA? It's one of the less intensive evaluations, so we can probably squeeze it later in the process.
- CES understands that we must demonstrate FR for the project (pursuant to 40 CFR 146.85) but would like to discuss the potential difficulties in obtaining such instruments at this stage of the project I assume this is a similar conversation as we had last time we spoke to them, and it is understood this comes late in the process. But CES should be prepared to purchase the instrument(s) before they construct.

Thank you and looking forward to discussing soon,

-Rebecca

Rebecca Hollis
Director Business Development -



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rhollis@cleanenergysystems.com

The Power to Reverse Climate Change

From: Ho, Yenhung <Ho.Yenhung@epa.gov>

Sent: Friday, October 9, 2020 9:03 AM

To: Rebecca Hollis <rhollis@cleanenergysystems.com>

Cc: Albright, David <Albright.David@epa.gov>; Keith Pronske <klpronske@cleanenergysystems.com>; Natalie Nowiski <NNowiski@slb.com>; Shari.Ring@cadmusgroup.com; MaryEllen.Tuccillo@cadmusgroup.com

Subject: RE: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

Hi Rebecca,

We are available for a call next Wednesday (10/14), 9:30AM-11:00AM PST. Please send an invite to us (David, Shari Ring and MaryEllen Tuccillo of Cadmus (cc'd), and me) if the time slot works for your team.

Please provide your questions prior to the call.

Best regards,
Calvin

From: Rebecca Hollis <rhollis@cleanenergysystems.com>

Sent: Thursday, October 8, 2020 9:16 AM

To: Ho, Yenhung <Ho.Yenhung@epa.gov>

Cc: Albright, David <Albright.David@epa.gov>; Keith Pronske <klpronske@cleanenergysystems.com>; Natalie Nowiski <NNowiski@slb.com>

Subject: RE: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

Hi Calvin, David,

Thank you for the comments on the Emergency and Remedial Response Plan and Financial Responsibility Demonstration submitted with our Class VI UIC permit application. We have reviewed the evaluation and information request and a few questions we would like to go over with you. Do you have some time next week to discuss? I think we could cover it in half hour but in light of Info Request #3, would like to block out an hour for the call as we may have some follow up questions/clarifications on that request as well.

Thank you again and happy Thursday,
-Rebecca

Rebecca Hollis
Director Business Development -



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rhollis@cleanenergysystems.com

The Power to Reverse Climate Change

From: Ho, Yenhung <Ho.Yenhung@epa.gov>

Sent: Thursday, October 1, 2020 1:04 PM

To: Rebecca Hollis <rhollis@cleanenergysystems.com>

Cc: Albright, David <Albright.David@epa.gov>

Subject: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

Hi Rebecca,

We have issued our second technical evaluation comments and information request today via the Information Request module of GSDT. Let us know if you have any questions about the request.

Sincerely,

Calvin Ho
Groundwater Protection Section
Water Division (WTR-4-2)
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415-972-3262

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